



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

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LITIGATION BUREAU

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November 11, 2022

Hon. Kiyo A. Matsumoto  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11202

**Re: Jesus Santiago v. Cuomo, et al. (12-CV-2137) (KAM) (SLT)**

Dear Judge Matsumoto:

This Office represents defendant Department of Corrections and Community Supervision (“DOCCS”) officials Annucci, Fischer and Tracy (“Defendants”) in the above-referenced action. Pursuant to the Court’s orders, the parties jointly submit the attached proposed stipulations the parties have negotiated these past weeks.

In addition, and also pursuant to the Court’s order, the parties report that, despite strenuous efforts, settlement has not been reached. Demands and offers were exchanged, but the parties remain far apart. Still, counsel on both sides remain open to discussion should circumstances change.

Thank you for your attention to this matter.

Respectfully submitted,

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/s/  
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cc:

Hon. Steven L. Tiscione  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
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